PETER J. LISKA, LLC 766 Shrewsbury Avenue Tinton Falls, NJ 07724 (732) 933-7777 (AJK 0179) Attorneys for Financial Resources Federal Credit Union

UNITED STATES BANKRUPTCY COURT District of New Jersey

In Re:		×	19-30455 CHAPTER 13
Maria Vicari	Debtor.	x x x x	APPLICATION IN SUPPORT OF CONSENT ORDER RESOLVING OBJECTION TO PLAN

WidtSIMATTER having been opened by the Creditor, Financial Resources Federal Credit Union, through its counsel, Peter J. Liska, LLC (Allison J. Kiffin, Esq. appearing) and counsel for the Debtor, Law Offices of Gillman, Bruton & Capone, LLC, Justin Gillman, Esq. appearing, is made in support of a Consent Order to allow creditor's Claim No. 7 as amended to be paid through the Plan for pre-petition arrearages. The Debtor is to continue making post-petition payments directly to the Creditor outside the plan.

Dated: Misron 3, 2020 By: <u>/s/Allison J. Kiffin, Esq.</u>
Allison J. Kiffin, Esq.

PETER J. LISKA, LLC 766 Shrewsbury Avenue Tinton Falls, NJ 07724 (732) 933-7777 (AJK 0179) Attorneys for Financial Resources Federal Credit Union

UNITED STATES BANKRUPTCY COURT District of New Jersey

In Re:

Maria Vicari,

Debtor.

CASE NO: 19-30455 CHAPTER 13

CONSENT ORDER RESOLVING CREDITOR'S OBJECTION TO THE PLAN Confirmation Hearing: March 3, 2019

Hon. Michael B. Kaplan, U.S.B.J.

This matter having been opened by the Creditor, Financial Resources Federal Credit Union, through its counsel, Peter J. Liska, L.L.C., Allison J. Kiffin, Esq., appearing, by way of Objection to Confirmation of the proposed Chapter 13 Plan, has conferred with the Debtor, through her counsel, Gillman, Bruton & Capone, L.L.C., Justin Gillman, Esq., appearing, and the parties have agreed to the entry of the within Consent Order resolving the Creditor's Objection to Confirmation of the Plan, as follows:

- The parties agree that the Creditor's Claim, as amended, Claim No.: 7, as to the 2012 Volvo S60 Turbo T5, will be paid through the Plan, for pre-petition arrears of \$2,316.19; and
- 2. The Debtor reserves the right to seek to modify the Creditor's claim #7 for 60 days after the confirmation of the Plan in the event that the Debtor is able to produce proof of automobile insurance coverage for the period before October 1,2019; and
- 3. The Debtor is to continue to make post-petition payments directly to the Creditor outside the Plan, commencing with the March 2020 payment; and

4. The Creditor agrees to amend their claim for the Volkswagon Jetta, Claim # 8, from secured to unsecured as the vehicle is no longer in the Debtor's possession.

By signing below, the parties agree to entry of the within Consent Order.

PETER J. LISKA, LLC Attorneys for Creditor.

By: Mison J. My ALLISON J. KIFFIN ESQ.

Dated: 3/2/2020

GILLMAN, BRUTON & CAPONE, L.L.C.

Attorneys for Debtor

JUSTIN GILLMAN, ESQ.

Dated: 3/2/2020